

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

*The Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al.*, Case No. 16-cv-07853

*The Underwriting Members of Lloyd's Syndicate 53, et al. v. Kingdom of Saudi Arabia, et al.*, Case No. 17-cv-02129

**MOTION TO EXTEND PRO HAC VICE ADMISSIONS**

PLEASE TAKE NOTICE that counsel of record for plaintiffs in *Federal Insurance Co., et al. v. Al Qaida, et al.*, Case No. 03-cv-06978,<sup>1</sup> move this Court for an Order extending the existing *pro hac vice* admissions of Cozen O'Connor attorneys Sean P. Carter, Stephen A. Cozen, Elliott R. Feldman, and J. Scott Tarbuton to the following cases consolidated into the above captioned multi-district litigation ("MDL") pending before this Court: *The Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al.*, Case No. 16-cv-07853; and *The Underwriting Members of Lloyd's Syndicate 53, et al. v. Kingdom of Saudi Arabia, et al.*, Case No. 17-cv-02129.

The *Underwriting Members of Lloyd's Syndicate 2* Complaint was originally filed in the United States District Court for the Western District of Pennsylvania on January 15, 2016, Case No. 16-cv-00019, asserting claims against non-sovereign defendants Al Rajhi Bank, National Commercial Bank ("NCB"), and Saudi Binladin Group ("SBG"). By order dated October 3,

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<sup>1</sup> Sean P. Carter, Stephen A. Cozen, Elliott R. Feldman, and J. Scott Tarbuton were admitted as counsel *pro hac vice* for purposes of the *Federal Insurance* action and the MDL on February 23, 2004. See ECF Nos. 49, 50, 45, and 46 respectively, Case No. 03-cv-06978.

2016, the United States Judicial Panel on Multidistrict Litigation transferred *Underwriting Members of Lloyd's Syndicate 2* to the Southern District of New York for consolidated pretrial proceedings, and was assigned to the Honorable George B. Daniels. *See* Transfer Order at MDL ECF No. 3351. The *Underwriting Members of Lloyd's Syndicate 53* Complaint, asserting claims against defendants Kingdom of Saudi Arabia and Saudi High Commission for Relief of Bosnia & Herzegovina, was filed in the Southern District of New York on March 23, 2017. *See* ECF No. 1, Case No. 17-cv-02129.

Undersigned counsel respectfully submits that moving for *pro hac vice* admissions for each of the Cozen O'Connor attorneys identified above in each related case will be inefficient, requiring multiple applications to this Court. Counsel therefore moves this Court for an order (1) extending the existing *pro hac vice* admissions of Sean P. Carter, Stephen A. Cozen, Elliott R. Feldman, and J. Scott Tarbutton to Case Nos. 16-cv-07853 and 17-cv-02129; and (2) permitting counsel to appear in Case Nos. 16-cv-07853 and 17-cv-02129 by filing notices of appearance. In the event that the Cozen O'Connor attorneys shall represent the interests of plaintiffs in other related cases which will be consolidated into the MDL, now or in the future, counsel additionally seeks an order from this Court extending the existing *pro hac vice* admissions to those cases as necessary. This Court recently issued an Order granting similar relief to counsel for the Kingdom of Saudi Arabia on March 28, 2017. *See* Order Extending *Pro Hac Vice* Admission to all Consolidated MDL Cases at MDL ECF No. 3485.

Dated: May 18, 2017

Respectfully submitted,

COZEN O'CONNOR

BY: /s/ Sean P. Carter, Esq.  
Sean P. Carter, Esq.  
Stephen A. Cozen, Esq.  
Elliott R. Feldman, Esq.  
J. Scott Tarbutton, Esq.  
One Liberty Place  
1650 Market Street, 28<sup>th</sup> Floor  
Philadelphia, PA 19103  
Tel: (215) 665-2000  
Fax: (215) 665-2013

Counsel for the *Federal Insurance, Lloyd's  
Syndicate 2*, and *Lloyd's Syndicate 53* Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Motion to Extend *Pro Hac Vice* Admissions was electronically filed this 18<sup>th</sup> day of May 2017. Notice of this filing will be sent to all parties in 03 MDL 1570 by operation of the Southern District of New York's Electronic Case Filing ("ECF") system. Parties may access this filing through the Court's ECF system.

/s/ Sean P. Carter, Esq.  
Sean P. Carter, Esq.